
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. :
JESSE GOODMAN : Mag. No. 05-8020 (MCA)

I, Lucille Pezzullo, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Department of Homeland Security, United States Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT B


continued on the attached page and made a part hereof.



Lucille Pezzullo, Special Agent
United States Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,
on January 27, 2005 at Newark, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One

On or about November 7, 2003, in Somerset County, in the District of New Jersey and elsewhere, defendant

JESSE GOODMAN

did knowingly and willfully possess a computer hard drive which contained at least 3 images of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), which images had been shipped and transported in interstate and foreign commerce by any means, including by computer, and which were produced using materials that had been shipped in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

Count Two

Prior to in or about November 2003, in Somerset County, in the District of New Jersey and elsewhere, defendant

JESSE GOODMAN

did knowingly and willfully receive material that contained child pornography as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2)(B).

ATTACHMENT B

I, Lucille Pezzullo, a Special Agent with the Department of Homeland Security, United States Immigration and Customs Enforcement, having conducted an investigation and having discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts:

1. On or about November 7, 2003, law enforcement officers conducted a search of 4 White Buck Run, Warren Township, New Jersey, the residence of defendant JESSE GOODMAN (hereinafter defendant "GOODMAN").

2. Among the items seized by law enforcement officers pursuant to the search was a Western Digital hard drive which had been manufactured in Malaysia, Serial Number WM3800262758 .

3. On or about September 2, 2004, law enforcement officers reviewed the contents of defendant GOODMAN's computer hard drive, which had been seized from his home as described in ¶¶ 1-2. Among the images and videos found on the computer hard drive were at least 300 or more files which contain what appears to be child pornography, as defined by Title 18, United States Code, Section 2256(8). Three of these files, which were found on defendant GOODMAN's computer hard drive, are described as follows:

a. **_YOANAL2.JPG:** This image depicts a prepubescent girl, visible from the torso down lying naked on her back with her legs spread apart exposing her genital region. An adult male is positioned between the prepubescent female's legs. The adult male's erect penis is penetrating the prepubescent girl's anal cavity.

b. **6yo_doing_just_fine_kiddy_pretten_lolita_underage_sex_kids((1)[1].jpg:** This image depicts a prepubescent girl who is naked from the waist down . Also appearing in the picture is an adult male, who is also naked and is visible from the waist down. The girl is holding the adult male's genitalia in her right hand, while she performs oral sex upon the adult male.

c. **6---1[1].jpg:** This image depicts an infant girl visible from the neck down, lying naked on her back with her legs spread exposing her genital region. Also visible in this image is an erect penis which is penetrating the anal cavity of the infant girl. The words "Baby Shi-2" appear in red letters in the bottom, left-hand corner of the image.

4. The images described in ¶3(b)-(c) were stored in the Temporary Internet Files located on the hard drive of defendant GOODMAN's computer. The image described in ¶3(a) had also been downloaded to the computer.

5. Based on my education, training, and experience, my discussions with other law enforcement officers, and to the best of my knowledge, the images described in ¶ 3a-c, were downloaded or otherwise received from the Internet based upon the location of the images, the internet banner appearing on at least one of the images, and the method of storage.